

LAW OFFICES  
**PAULA J. NOTARI**  
152 West 57<sup>th</sup> Street  
8<sup>th</sup> Floor  
NEW YORK, NEW YORK 10019  
-----  
Tel. (646) 943-2172

March 18, 2018

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Jason Galanis et al  
16-cr-0371-4 (RA)

Dear Judge Abrams:

As the Court is aware, I previously requested an adjournment of Mr. Cooney's sentencing currently scheduled for April 4, 2019 because I was scheduled for trial before Judge Paul G. Gardephe in *United States v. Latique Johnson*, 16CR281. We have just started our 5<sup>th</sup> week of trial and it is expected that we will complete the case by the end of the week. I have been consumed in preparation of this case for many months leading up to trial and I need additional time to prepare for Mr. Cooney's sentencing. I must revisit the Court's decision regarding post-trial motions and certainly familiarize myself with the transcript and arguments recently made in the sentencing of co-defendant, John Galanis. I still have extensive briefing to do on legal issues concerning Mr. Cooney's sentencing and I must also organize and seek additional mitigating documentation.

We fully expected this case to wrap up more quickly but there were delays because of the government shutdown earlier in the year. Though I anticipate that the trial will be over by the end of the week, I have not been able to review recent submissions nor adequately prepare sentencing submissions for Mr. Cooney. Once the trial is finished, I have childcare obligations while my children are on spring break the week of April 7, 2019. I respectfully ask if the Court could give me any date after May 3 for submission which would give me adequate time to complete the sentencing submission and a date for sentencing to follow. This would also allow Mr. Cooney to make adequate travel plans for sentencing.

I thank you for your time and consideration. If additional information is required please feel free to contact me at any time.

Respectfully submitted,

/S/

Paula J. Notari  
Attorney for Bevan Cooney

cc: All Parties electronically

